

REMARKS

This is intended as a full and complete response to the Office Action dated March 23, 2005, having a shortened statutory period for response set to expire on June 23, 2005. Claims 1, 6 and 9 have been amended to more clarify the invention. New claims 10-13 have been added to more clearly recite aspects of the invention. Applicant believes no new matter has been introduced by the amendments and the new claims presented herein. The amendments have been made in a good faith effort to advance prosecution on the merits. Claim 5 has been cancelled without prejudice. Applicant reserves the right to subsequently take up prosecution of the claims as originally filed in this application in a continuation, a continuation-in-part and/or a divisional application. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-4 and 6-9 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,155,343 (*Nazzal*).

Nazzal generally proposes a system for cutting materials in wellbores. However, *Nazzal* does not teach or disclose an axial displacement part being located between the first anchor and the second anchor, as recited in claims 1 and 9. Accordingly, claims 1 and 9 are patentable over *Nazzal*. Claims 2-4 and 6-8 are also patentable over *Nazzal* since they depend from claim 1.

Claims 1-2 and 6-9 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,012,526 (*Jennings*).

Jennings generally proposes a method for sealing junctions in multilateral wells. However, like *Nazzal*, *Jennings* does not teach or disclose an axial displacement part being located between the first anchor and the second anchor, as recited in claims 1 and 9. Accordingly, claims 1 and 9 are patentable over *Jennings*. Claims 2 and 6-8 are also patentable over *Jennings* since they depend from claim 1.

Claims 1-2 and 5 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,692,565 (*MacDougall*).

MacDougall generally proposes an apparatus and method for sampling an earth formation through a cased borehole. However, *MacDougall* does not teach or disclose an axial displacement part being located between the first anchor and the second

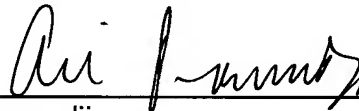
anchor, as recited in claim 1. Accordingly, claim 1 is patentable over *MacDougall*. Claims 2 and 5 are also patentable over *MacDougall* since they depend from claim 1.

With regard to new claims 10-13, Applicant submits that claims 10-13 recite subject matter that is neither disclosed, taught, nor otherwise suggested by the cited references, and as such, allowance of these claims is respectfully requested.

In conclusion, the references cited by the Examiner, neither alone nor in combination, teach, show, or suggest the claimed invention. Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

The prior art made of record is noted. However, it is believed that the secondary references are no more pertinent to the Applicant's disclosure than the primary references cited in the office action. Therefore, it is believed that a detailed discussion of the secondary references is not deemed necessary for a full and complete response to this office action. Accordingly, allowance of the claims is respectfully requested.

Respectfully submitted,



Ari Pramudji

Registration No. 45,022

MOSER, PATTERSON & SHERIDAN, L.L.P.

3040 Post Oak Blvd., Suite 1500

Houston, TX 77056

Telephone: (713) 623-4844

Facsimile: (713) 623-4846

Attorney for Applicant